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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
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13 FRANCE TELECOM, S.A.,  
14  
15 Plaintiff,  
16 - against -  
17 MARVELL SEMICONDUCTOR, INC.,  
18 Defendant.

Case No. 12-CV-04967 (WHA)

ECF CASE

**JOINT CLAIM CONSTRUCTION  
AND PREHEARING STATEMENT  
PURSUANT TO PATENT LOCAL  
RULE 4-3**

Pursuant to Patent Local Rule 4-3, Plaintiff France Telecom, S.A. ("France Telecom") and Defendant Marvell Semiconductor, Inc. ("Marvell") (collectively the "Parties") submit this Joint Claim Construction and Prehearing Statement (the "Statement").

**I. Construction of Those Terms on Which the Parties Agree**

The Parties have agreed on constructions for the following terms:

<b><u>Claim Term</u></b>	<b><u>Agreed Construction</u></b>
"source [digital] data element"	data element to be coded by the claimed method
"combining"	calculating one or more values from two or more values
"temporally interleaving said source data elements"	modifying the order of the source data elements

**II. Proposed Construction of Disputed Claim Terms**

Attached to this Statement as Exhibit A is a chart that provides each party's proposed construction for each of the disputed terms, side-by-side. Exhibit B is a chart that provides France Telecom's proposed constructions with the intrinsic and extrinsic evidence that supports each of France Telecom's proposed constructions. Exhibit C is a chart that provides Marvell's proposed constructions with the intrinsic and extrinsic evidence that supports each of Marvell's proposed constructions. Pursuant to the Court's February 6, 2013 Order, the number of claim terms to be considered at the claim construction hearing is limited to a maximum of six terms.

**III. Anticipated Time Necessary for Claim Construction Hearing**

The Parties anticipate that the length of time necessary for the Claim Construction Hearing is approximately two to four hours.

1           **IV.    Witnesses**

2           The Parties do not intend to offer live witness testimony at the Claim Construction  
3           Hearing. Each party, however, has identified one expert witness to provide written testimony  
4           upon which the parties can rely supporting their proposed constructions.

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6           DATED: May 17, 2013

7           DATED: May 17, 2013

8           /s/ Joseph J. LoBue

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